

Exhibit E

Jacquelyn Callanen

April 04, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)
ET AL)
vs.) CASE NO. 5:21-CV-844-XR
GREGORY W. ABBOTT, ET AL)

OCA-GREATER HOUSTON, ET AL)
vs.) CASE NO. 1:23-CV-780-XR
JOHN SCOTT, ET AL)

HOUSTON JUSTICE, ET AL)
vs.) CASE NO. 5:21-CV-848-XR
GREGORY WAYNE ABBOTT, ET AL)

LULAC TEXAS, ET AL)
vs.) CASE NO. 1:21-CV-0786-XR
JOHN SCOTT, ET AL)

MIFAMILIA VOTA, ET AL)
vs.) CASE NO. 5:21-CV-0920-XR
GREG ABBOTT, ET AL)

UNITED STATES OF AMERICA)
vs.) CASE NO. 5:21-CV-1085-XR
THE STATE OF TEXAS, ET AL)

ORAL VIDEOTAPED DEPOSITION

JACQUELYN CALLANEN

APRIL 4, 2022

1 ORAL VIDEOTAPED DEPOSITION OF JACQUELYN CALLANEN,
2 produced as a witness at the instance of the Defendant
3 and duly sworn, was taken in the above-styled and
4 numbered cause on the 4TH day of April, 2022, from
5 9:11 a.m. to 4:38 p.m., before Sarah A. Prugh ,
6 Certified Shorthand Reporter in and for the State of
7 Texas, reported by machine shorthand at the Offices of
8 The Texas Attorney General, Consumer Protection
9 Division, San Antonio Regional Office, 112 E. Pecan,
10 Suite 735, San Antonio, Texas, pursuant to the Federal
11 Rules of Civil Procedure and the provisions stated on
12 the record or attached hereto.

1 were told the reason it was rejected. You know, this
2 form, the form that we have is a -- it is basically a
3 checklist where all of the items are listed and then the
4 staff member just checks you were rejected because you
5 didn't have your -- one of these numbers. It was
6 rejected because you didn't sign it. It was rejected
7 because your assistant on it did not give their address.

8 It was assigned -- there is all of these different
9 reasons that we have used in the past.

10 Q. And is all you did mail it, mail them the
11 rejection and send it back to them?

12 A. Yes. And again, this letter tells them we need
13 to have it back, you know, in-house and the date they
14 had to have it back to us.

15 Q. And do you know how many actually sent it back
16 corrected?

17 A. No.

18 Q. Did you call or email any of these people
19 regarding their applications?

20 A. We did not call or email on the applications
21 but we did call/email/send notices on the actual ballot.

22 Q. Were you permitted to call and email people who
23 had submitted applications with errors with the numbers
24 provided?

25 A. Probably. I mean I know we have done it case

1 Q. So is it fair to say that the poll watchers are
2 reporting back to the candidates, not to you?

3 A. Correct, or to the parties.

4 Q. Are you aware that SB-1 required poll watchers
5 to complete training?

6 A. Yes.

7 Q. What do you know about that training?

8 A. It is a joke.

9 Q. Why do you say that?

10 A. It is set up on the Secretary of State's web
11 site. You can click through it. There is no
12 timing/time limit. You just have to click through the
13 pages, get to the last page and print your certificate.
14 The Secretary of State has managed for many years a
15 wonderful program where the election officials can go
16 for training. And they have to go through their modules
17 and modules and modules and then they are required to
18 take a test. And if they don't pass the test, well then
19 they don't get their certificate. But there is no such
20 requirement for the poll watchers. They just have to
21 sit there and click through the program themselves and
22 they can print their certificate. And so from that
23 standpoint, we have no -- absolutely no standing to know
24 if they have taken the training, if they in fact
25 themselves took the training or someone else didn't sign

1 in for them to get a certificate.

2 Q. What does the certificate say on it?

3 A. It just says -- I have one. Of course I wanted
4 to see how this was. I first-hand went onto the system
5 and took the training and printed out my certificate.
6 And I made copies and made sure that every one of my
7 election officials at every poll site had a copy of that
8 certificate so they knew what it would look like. And
9 so it just says Jackie Callanen has been appointed as a
10 poll watcher for the State of Texas. And this one is
11 effective August -- and I don't -- I want to say it is
12 August 1st of 2022. So they all have to go in and play
13 this game again for the November ballot.

14 It was given for -- I don't know -- like
15 six months, eight months. But it expires in August of
16 2022.

17 Q. Are the poll watchers now required to take an
18 oath?

19 A. Yes, they always had to.

20 Q. What was the change to the oath in SB-1?

21 A. Now it says -- it is more of a constitutional
22 oath. And I think this one now says that they don't
23 have any cameras or recording devices with them.

24 (Exhibit 7 marked)

25 Q. (By Mr. Jeff White) Let me hand you another